

AO 91 (Rev. 11/11) Criminal Complaint

Agent:

AUSA: Michael Martin

Anthony Perez

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Angelo Ainaga-Jaspe

Case No. 25-mj-30097

I hereby certify that the foregoing is a certified copy of the original on file in this office.

Clerk, U.S. District Court  
Eastern District of Michigan

By: s/ Shelby Hicks

Deputy



## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 20, 2025 in the county of Macomb in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

18 U.S.C. 922(g)(5)(A)

*Offense Description*

Alien in Possession of firearm and ammunition

This criminal complaint is based on these facts:  
 See Attached Affidavit

☒ Continued on the attached sheet.

  
 Complainant's signature

BPA Anthony Perez

Printed name and title

Sworn to before me and signed in my presence.

Date: February 27, 2025City and state: Detroit, Michigan

  
 Judge's signature

Hon. Anthony P. Patti

Printed name and title

February 27, 2025

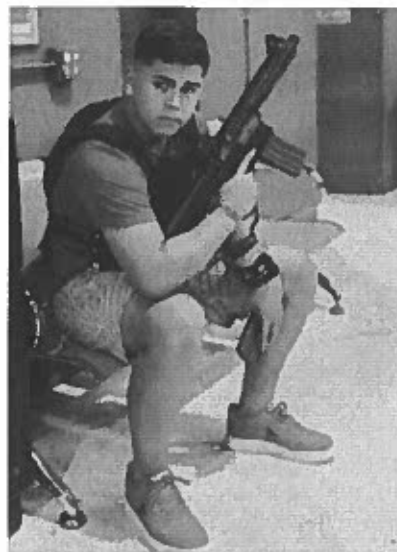
**AFFIDAVIT**

I, Anthony Perez, being duly sworn, depose and state the following:

1. I am a Border Patrol Agent (BPA) with the United States Border Patrol (USBP), which is a component agency of the Department of Homeland Security. I have been employed by the USBP since August 2009. From December 11, 2024, through the present I have been assigned to the Detroit Sector Anti-Smuggling Unit (DTM ASU) as a Field Investigative Team (FIT) Agent. DTM ASU is tasked with collecting intelligence and conducting investigations regarding illicit cross-border activity within or affecting the Detroit, Michigan vicinity. As a FIT Agent, I am responsible for intelligence collection and investigations, and assisting others with such investigations as needed. I have participated with multiple taskforces throughout my career as a Border Patrol Agent and have been involved in a variety of investigations, from human smuggling, drug trafficking, bulk cash smuggling, and weapons trafficking, to terrorism, terroristic threats, child pornography, sexual assault, grand larceny, murder, and other federal and state violations.
2. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports regarding the events and circumstances and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.
3. On February 20, 2025, an officer from the Warren Police Department conducted a traffic stop of a car driven by a male suspect, who was the sole occupant. The suspect provided the police officer with a temporary Florida driver's license in the name of Angelo AINAGA-JASPE. The police officer conducted computer checks on AINAGA-JASPE and learned that he is not a United States citizen. The police officer contacted the United States Border Patrol. Border Patrol Agents arrived on scene and conducted an immigration inspection. Agents questioned AINAGA-JASPE as to his immigration status to which he stated he does not have any documents allowing him to work, live and reside in the United States and that he is a citizen of Venezuela.

4. Border Patrol Agents arrested AINAGA-JASPE and transported him to the Detroit Border Patrol Station for further processing and to begin removal proceedings. At the Detroit Border Patrol Station, AINAGA-JASPE was fingerprinted and database checks confirmed him to be Angelo AINAGA-JASPE, who is a citizen and national of Venezuela without any legal authority to be present in the United States. At the time of his arrest, AINAGA-JASPE was in possession of two cellular telephones, one of which was a white Apple iPhone.
5. According to immigration records, AINAGA-JASPE illegally entered the United States near Eagle Pass, Texas. AINAGA-JASPE was arrested by the United States Border Patrol and paroled into the United States on July 12, 2022. His parole expired two years after his illegal entry into the country. Since the expiration of his parole, AINAGA-JASPE has been illegally present in the United States.
6. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code, to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.
7. During processing, AINAGA-JASPE claimed he lived at [REDACTED] 31 14<sup>th</sup> Ave NE, Naples, Florida 34120 prior to moving to [REDACTED] 11 Lansdowne Street, Detroit, Michigan 48224. AINAGA-JASPE stated he moved to Michigan approximately four months ago.
8. While conducting record checks, Border Patrol Agents discovered information in Customs and Border Protection databases identifying AINAGA-JASPE as a potential associate of Tren de Aragua (TDA). TDA is a transnational criminal organization and U.S. designated Foreign Terrorist Organization from Venezuela. This information included two photographs. In one of those photographs, a man is carrying what appeared to a black AR-style rifle with a scope. The man is dressed in all black with a hoodie over his head and black cloth covering the lower part of his face. A black pistol can be seen tucked into his pants near his waist. It appears the man is taking the picture in front of a mirror using a white Apple iPhone, which matches the

description of one of the cellular telephones AINAGA-JASPE possessed at the time of his arrest. The other picture was of AINAGA-JASPE sitting down and holding what appears to be an assault rifle. The two pictures are below:



9. On February 21, 2025, a Border Patrol Agent who speaks fluent Spanish interviewed AINAGA-JASPE. AINAGA-JASPE was advised in Spanish of his Miranda rights and he gave written consent in which he acknowledged his rights and agreed to speak with the Agent. During this interview, AINAGA-JASPE advised he did not know any members of the gang nor was he a member of any gang. When AINAGA-JASPE saw the two pictures mentioned above, he acknowledged that he was the person in the pictures. AINAGA-JASPE stated that he has shot guns at Range USA, a local gun range. AINAGA-JASPE also stated that he has videos of himself shooting guns at gun ranges on his cellular telephones that were in his possession at the time of his arrest. AINAGA-JASPE admitted he was not allowed to legally own or operate firearms due to his status in the United States as an illegal alien. AINAGA-JASPE stated he does not have a hunting license and was not in possession of the firearms to hunt animals.
10. On February 21, 2025, I spoke with an employee at the Range USA located in Southgate, Michigan. The employee confirmed that AINAGA-JASPE had a user profile established at Range USA, which contained the following identifying information:

Name: Angelo AINAGA

Email: angelo.ainaga@icloud.com

Phone: (313) [REDACTED]-7226

License Number: [REDACTED]9000

Last Visit: 12/09/2024

11. Agents queried the phone number provided on AINAGA-JASPE's Range USA profile through CLEAR, an open-source database. The results of the showed that the registered owner of the phone number was Angelo Dennis Jesus AINAGA-JASPE of [REDACTED] 11 Lansdowne Street, Detroit, Michigan 48224 and previously of [REDACTED] 31 14<sup>th</sup> Avenue NE, Naples, Florida 34120.
12. Agents conducted a search through the National Law Enforcement Telecomm System (NLETS) utilizing the Florida driver's license number listed on AINAGA-JASPE's Range USA profile. Agents reviewed the picture associated with the Florida driver's license and determined that the person in the picture is AINAGA-JASPE. Additionally, the Florida driver's license identified AINAGA-JASPE's Florida address as [REDACTED] 31 14<sup>th</sup> Avenue NE, Naples, Florida 34120. On the NLETS register in all capital letters it reads: "DRIVER IS NOT A U.S. CITIZEN."
13. AINAGA-JASPE provided a Border Patrol Agent written consent – in the Spanish language – allowing law enforcement officers to search his two cellular telephones. Agents searched the phones and found videos showing AINAGA-JASPE loading, handling, and firing a pistol at a gun range. Metadata connected to the videos identified the location where the videos were taken. Based on this data, Agents were able to determine that the videos were taken at Downriver Guns located at 19999 Dix Toledo Road, Brownstown Township, Michigan. This location is also located within the Eastern District of Michigan.
14. On February 25th, 2025, the manager at Downriver Guns provided me with a sales receipt dated December 9, 2024. The receipt lists the "customer" as "Angelo Ainaga" and the customer's address as "[REDACTED] 11 lansdown st [REDACTED] 31 14<sup>th</sup> ave NE Detroit MI 48210." The receipt also listed the same customer phone number and email address contained in the Range USA profile mentioned above. The receipt showed a purchase of one hour of range time and two boxes of Scorpion brand 9mm 115gr FMJ ammunition. According to Scorpion Ammo's website, the company is located at 2010 East University Drive STE

15, Tempe, Arizona 85288. The website states: "All ammunition is manufactured right here in the United States at our Tempe, Arizona facility."

15. I showed the videos of AINAGA-JASPE shooting the firearm at Downriver Guns to Acting Patrol Agent-in-Charge Shaun Koltuniak of the U.S. Border Patrol. Agent Koltuniak stated the firearm being used by AINAGA-JASPE is a Glock model 19 which requires only 9mm ammunition, the same size ammunition purchased by AINAGA-JASPE at Downriver Guns on December 9, 2024. Agent Koltuniak is the owner of a Federal Firearms Licensed (FFL) gun shop and former Glock armorer and is therefore familiar with the unique appearance of Glock firearms. According to Glock's website, Glock firearms are manufactured at facilities in Austria, Slovakia, and the State of Georgia. Therefore, the above-described firearm travelled in interstate or foreign commerce.
16. Based on the above facts, I have probable cause to believe that on or about December 9, 2024, in the Eastern District of Michigan, Angelo AINAGA-JASPE, an alien who is illegally or unlawfully in the United States, did knowingly possess in or affecting interstate or foreign commerce, a firearm and ammunition, in violation of Title 18, United States Code, Section 922(g)(5)(A).

Respectfully submitted,



Anthony R. Perez  
Border Patrol Agent  
United States Border Patrol

Subscribed and sworn to before me and signed in my presence and/or by reliable electronic means.



HON. ANTHONY P. PATTI  
UNITED STATES MAGISTRATE JUDGE

February 27, 2025